



3. Allowing amendment will promote judicial efficiency and serve the interests of justice by enabling this case to proceed on the merits against the non-bankrupt Defendants, while preserving Defendant Linarducci's stay for his pending bankruptcy proceeding.

4. Counsel for Plaintiffs have conferred with counsel for Defendants Integrity Wealth Partners, LLC and Ducci Enterprises, LLC ("Defendants"). Defendants contend that Plaintiff's Amended Complaint violates the automatic stay imposed by Mr. Linnarducci's bankruptcy proceedings. (Doc. 31). Defendants have advised that they consent to the filing of the attached Second Amended Complaint to resolve the parties' dispute about the alleged automatic stay violation, reserving all rights to answer or otherwise respond to the Second Amended Complaint. WHEREFORE, Plaintiffs respectfully request that this Court enter an order granting Plaintiffs leave to file the attached Second Amended Complaint, deeming it filed instant, and for such other relief as the Court deems just and proper.

Dated: September 12, 2025

Respectfully Submitted,

/s/ Ross M. Good

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2025, I filed the foregoing *Plaintiffs' Motion for Leave to File Amended Complaint* electronically with the Clerk of the Court. Notice of this filing will be sent to the following by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Ross M. Good

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